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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)	
)	2:15-cr-00198-GMN-NJK
Plaintiff,)	
)	
v.)	UNITED STATES' UNOPPOSED
)	MOTION FOR AN EXTENSION OF
JUNZO SUZUKI & PAUL SUZUKI,)	TIME TO FILE A RESPONSE TO
)	DEFENDANTS' OBJECTION TO THE
Defendants.)	MAGISTRATE JUDGE'S REPORT AND
)	RECOMMENDATION (ECF NO. 468)

The United States of America, through Joseph S. Beemsterboer, Acting Chief of the Criminal Division, Fraud Section (Cory E. Jacobs and Della Sentilles, Trial Attorneys, appearing) and Christopher Chiou, Acting United States Attorney (Jessica Oliva, Assistant United States Attorney, appearing), by and through its undersigned counsel, respectfully moves the Court for an unopposed one-month extension of time to file a response to Junzo Suzuki's and Paul Suzuki's

1 Objection to the Magistrate Judge's Report and Recommendation. ECF No. 468. In support of its
2 motion, the government states as follows:

3 1. On August 18, 2021, the defendants filed a motion to dismiss the superseding
4 indictment. ECF No. 450.

5 2. On September 21, 2021, U.S. Magistrate Judge Nancy J. Koppe issued a Report
6 and Recommendation recommending that the defendants' motion to dismiss the superseding
7 indictment be denied. ECF No. 466.

8 3. On October 5, 2021, the defendants filed an objection to the Magistrate Judge's
9 Report and Recommendation. ECF No. 468.

10 4. The government's response to the defendants' objection is due on October 19,
11 2021.

12 5. The parties are currently engaged in formal plea negotiations and are working
13 expeditiously to resolve this matter. To the extent that the parties are able to reach an agreement,
14 such a resolution would negate the need for the Court to rule on the defendants' objection to the
15 Report and Recommendation.

16 6. As such, the government respectfully moves the Court for a one-month extension
17 of time in which to respond to Junzo Suzuki's and Paul Suzuki's Objection to the Magistrate
18 Judge's Report and Recommendation, ECF No. 468, to allow the parties sufficient time to work
19 towards a resolution and to conserve judicial resources.

20 7. Counsel for the defendants do not oppose the government's motion.

21 8. For these reasons, the government respectfully requests that the Court grant the
22 instant motion and set a new deadline for the government's response of November 19, 2021.

23 Dated: October 14, 2021
24

Respectfully submitted,

JOSEPH S. BEEMSTERBOER
Acting Chief, Fraud Section
Criminal Division
United States Department of Justice

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada

s/ Della Sentilles
CORY E. JACOBS
DELLA SENTILLES
Trial Attorneys
Criminal Division, Fraud Section

s/ Jessica Oliva
JESSICA OLIVA
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Department of Justice, Criminal Division, Fraud Section. A copy of this motion was served upon counsel of record, via Electronic Case Filing (ECF).

DATED this 14th day of October, 2021.

/s/ Della Sentilles
DELLA SENTILLES
Trial Attorney
Criminal Division, Fraud Section

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,)

4 Plaintiff,)

5 v.)

6 JUNZO SUZUKI & PAUL SUZUKI,)

7 Defendants.)

2:15-cr-00198-GMN-NJK

[PROPOSED] ORDER

8
9 Before the Court is the United States' Unopposed Motion for an Extension of Time to File
10 a Response to Defendants' Objection to the Magistrate Judge's Report and Recommendation.
11 Based on the statements made in the United States' Motion:

12 IT IS HEREBY ORDERED: That the United States' Unopposed Motion for an Extension
13 of Time to File a Response to Defendants' Objection to the Magistrate Judge's Report and
14 Recommendation is GRANTED.

15 IT IS FURTHER ORDERED: That the United States' Response to Defendants' Objection
16 to the Magistrate Judge's Report and Recommendation is due by **November 19, 2021**.

17
18 **SO ORDERED** on this 18 day of October, 2021.

19
20
21 
22 HONORABLE GLORIA M. NAVARRO
23 UNITED STATES DISTRICT JUDGE
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